

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

SALAMO NAM RAKOTOJOELINANDRASANA

CRIMINAL COMPLAINT

Case Number:

MS 10-176 A JB

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 5, 2010, in Stearns County, in the State and District of Minnesota, defendant(s) SALAMO NAM RAKOTOJOELINANDRASANA

did by force, violence and intimidation, take from the person or presence of another approximately \$6,000.00, in United States currency belonging to and in the care, custody, control, management and possession of the TCF Bank, located in St. Cloud, Minnesota, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation; all in violation of Title 18, United States Code, Sections 2113(a).

SEE ATTACHED AFFIDAVIT

in violation of Title 18, United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

The Honorable Arthur J. Boylan
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Complainant
Chad Schliepsieck
FBIat Minneapolis
St. Paul, MN
City and State

Signature of Judicial Officer

SCANNED

MAY 13 2010

U.S. DISTRICT COURT ST. PAUL

Affidavit

I, Chad Schliepsiek, Special Agent of the Federal Bureau of Investigation, after being duly sworn, from personal knowledge and from other information received from individuals, agents and officers, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) at St. Cloud, Minnesota, having been so employed with the FBI since February 23, 2003. I am assigned to the St. Cloud Resident Agency and investigate, among other things, federal violations involving bank robbery.

2. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and, therefore, contains only a summary of relevant facts. Based upon all of the facts and information set forth in this affidavit, your affiant believes that probable cause exists to believe that on or about May 5, 2010, SALAMO NAM RAKOTOJOELINANDRASANA robbed the TCF Bank located in St. Cloud, Minnesota in violation of Title 18, United States Code, Sections 2113(a).

3. On May 5, 2010, at approximately 6:49 pm, St. Cloud Police Officers responded to an armed robbery call at TCF bank, located at 200 25th Avenue South, City of St. Cloud, County of Stearns, State of Minnesota. The investigation revealed a male, approximately 5'9" with a stocky build entered the bank displaying a handgun and demanded money from the victim teller. In addition, the victim

teller handed the suspect approximately \$6000.00 in cash, consisting mainly of \$20.00 denominations. The victim teller also handed the armed suspect a red dye pack disguised as money which was placed in the suspect's backpack with the other money taken from the victim teller.

4. The TCF bank surveillance video shows the armed suspect exiting the rear door of the TCF bank.

5. On May 10, 2010, Affiant was contacted by Prior Lake Police Department who advised they were notified by Mystic Lake Casino in Prior Lake, Minnesota, that an individual, who was later determined to be SALAMO NAM RAKOTOJOELINANDRASANA, was inserting red dye-stained United States currency in the slot machines at Mystic Lake Casino.

6. Affiant and FBI Special Agent Shane Ball traveled to Prior Lake Police Department. SALAMO NAM RAKOTOJOELINANDRASANA consented to speak to the FBI agents.

7. SALAMO NAM RAKOTOJOELINANDRASANA initially advised he found the backpack in a dumpster behind the TCF bank on May 5, 2010, at approximately 7:00 p.m. Upon further questioning, SALAMO NAM RAKOTOJOELINANDRASANA confessed to robbing the bank.

8. SALAMO NAM RAKOTOJOELINANDRASANA confessed that on May 5, 2010, after departing Gold's Gym in St. Cloud, Minnesota, he drove his black 1996 Pontiac Sunfire to the rear of the TCF bank. He stated he parked his vehicle and then walked around to the front of

the bank where he covered part of his face with a neck gator and entered the bank. Once inside the bank, SALAMO NAM RAKOTOJOELINANDRASANA admitted he pulled out a gun, later clarified that it was a CO'2 power air pistol, walked to the victim teller and demanded money. SALAMO NAM RAKOTOJOELINANDRASANA also admitted he pointed the gun at other bank employees and demanded the employees get on the ground. After obtaining money, SALAMO NAM RAKOTOJOELINANDRASANA exited the back exit of the bank and fled in his previously described vehicle.

9. In the course of the interview, SALAMO NAM RAKOTOJOELINANDRASANA advised the clothes he wore during the robbery where at his apartment, located at 1703 University Drive, Apartment 302, room D, St. Cloud, Minnesota. In a subsequent state Search Warrant at the previously described address, a jacket, pants, shoes, gloves and hat were located. The jacket, pants, shoes, gloves, and hat were consistent with that which was described by SALAMO NAM RAKOTOJOELINANDRASANA and appear identical to the articles of clothing worn by the robber and captured by bank surveillance video.

10. SALAMO NAM RAKOTOJOELINANDRASANA confessed that the weapon used during the robbery, and a portion of the stained money, where located inside the glove box of his vehicle. SALAMO NAM RAKOTOJOELINANDRASANA consented to a search of his vehicle. During the search of the vehicle, approximately \$617.00 red dyed

stained United States Currency and a CO'2 powered air pistol, covered in red dye stain, was located in the glove box of the vehicle. Also located in the back seat of the vehicle was a black duffle bag which contained \$1,692.00 red dye stained United States Currency.

11. SALAMO NAM RAKOTOJOELINANDRASANA confessed that he took the proceeds of the bank robbery to the Mystic Lake Casino to launder the dye packed stained currency. Surveillance at Mystic Lake Casino captured images of SALAMO NAM RAKOTOJOELINANDRASANA inserting dye stained money into various slot machines.

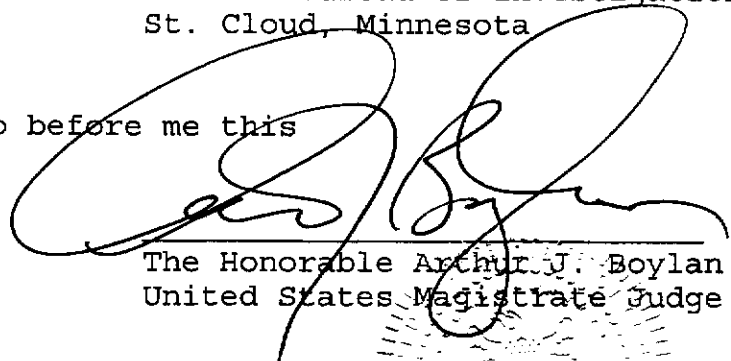
12. At the time of the robbery, the deposits of the TCF Bank in St. Cloud, Minnesota were insured by the Federal Deposit Insurance Corporation.

13. The above is known to the undersigned to be true through reliable information obtained from the results of the investigation conducted by the FBI.



Chad Schliepsiek, Special Agent
Federal Bureau of Investigation
St. Cloud, Minnesota

Subscribed and sworn to before me this
11 day of May, 2010.



The Honorable Arthur J. Boylan
United States Magistrate Judge